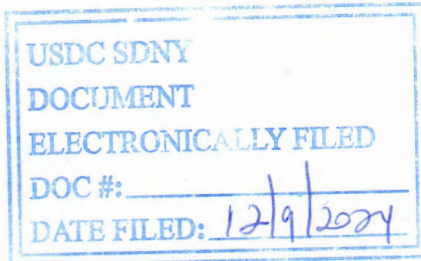


BELDOCK LEVINE & HOFFMAN LLP
 99 PARK AVENUE, PH/26TH FLOOR
 NEW YORK, N.Y. 10016

JONATHAN C. MOORE
 DAVID B. RANKIN
 LUNA DROUBI
 MARC A. CANNAN
 JONATHAN K. POLLACK
 HENRY A. DLUGACZ
 STEPHEN J. BLUMERT
 MYRON BELDOCK (1929-2016)
 LAWRENCE S. LEVINE (1934-2004)
 ELLIOT L. HOFFMAN (1929-2016)

TEL: (212) 490-0400
 FAX: (212) 277-5880
 WEBSITE: blhny.com

COUNSEL
 PETER S. MATORIN
 CYNTHIA ROLLINGS
 KAREN L. DIPPOLD
 JODY YETZER
 MARJORY D. FIELDS
 EMILY JANE GOODMAN
 JUSTICE, NYS SUPREME COURT RET.
 FRANK HANDELMAN



REF: 8476.01
 WRITER'S DIRECT CONTACT:

December 6, 2024

212-277-5825
 drankin@blhny.com

VIA ECF

Hon. Colleen McMahon
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

Re: *Guzman v. The City of New York, et al.*
24-cv-00363(CM)

*12/9/2024
 OK but no extension
 additional st
 open this*

Your Honor:

Our firm represents plaintiff Maria Guzman in the above-referenced matter. I write to respectfully request a two-week extension of time to file a motion for leave to amend the complaint. This is the first request for this relief, and I write with the consent of the defendants. I request this extension because the associate assigned to this case, who was primarily responsible for this motion, has gone on a medical leave. As a result, work assignments are being shuffled to accommodate having one fewer associate and getting a new associate up to speed on this case, in addition to other obligations this absence has created. Additionally, the undersigned is out of State at a CLE from December 11th to 13th.

The requested modification to the schedule is below. The reason for the length of time for the response is due to defense counsel being out of the office for the holidays.

BELDOCK LEVINE & HOFFMAN LLP

Hon. Colleen McMahon
December 6, 2024
Page 2

	<u>Presently</u>	<u>Requested extension</u>
Plaintiff's motion:	December 13, 2024	December 27, 2024
Defendants' response:	December 27, 2024	January 24, 2025
Plaintiff's reply:	January 3, 2025	January 31, 2025

We appreciate Your Honor's consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'David B. Rankin', with a long horizontal flourish extending to the right.

David B. Rankin

cc: All Counsel (by ECF)